

CHRIS SCHWEGMANN
Partner

D 214 981 3835
F 214 981 3839
cjs@lynnllp.com

Lynn Pinker Hurst & Schwegmann, LLP
2100 Ross Avenue
Suite 2700
Dallas, Texas 75201
lynnllp.com

June 26, 2023

Via ECF and First Class U.S. Mail

Honorable Judge Paul A. Crotty
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: 1:23-cv-02221 (PAC); *DIRECTV, LLC v. Nexstar Media Group, Inc. et al.*

Dear Judge Crotty:

We represent Defendant Nexstar Media Group, Inc. and write on behalf of the Defendants in this matter. Pursuant to Rule 7 of Your Honor's Individual Practices, we file this Unopposed Motion to Seal certain portions of the contemporaneously filed Memorandum of Law in Support of Motion to Dismiss the Complaint. Per Rule 7 of the Individual Practices, Defendants have publicly filed a version of the Memorandum with the proposed redactions and have also filed an unredacted version of the Memorandum under seal with the proposed redactions highlighted.

DIRECTV, LLC's Complaint was filed partially under seal, with certain passages reflecting or discussing contractual provisions redacted within the public version of the pleading. *See Redacted Compl.*, ECF No. 1. Defendants' Memorandum directly references those contractual provisions. Thus, in an effort to maintain consistency with the treatment of information placed under seal by Plaintiff, Defendants have redacted passages reflecting or discussing those

provisions.¹ Defendants have additionally redacted passages that reference or relate to other contractual provisions.

Counsel for Defendants have conferred with counsel for Plaintiff regarding the substance of this Motion to Seal and Plaintiff is **unopposed** to the requested relief. Accordingly, Defendants request an Order permitting Defendants to file the Memorandum partially under seal.

Respectfully submitted,



Christopher J. Schwegmann
Texas Bar No. 24051315
cjs@lynnllp.com
LYNN PINKER HURST & SCHWEGMANN, LLP
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
Telephone: (214) 981-3835

**COUNSEL FOR DEFENDANT
NEXSTAR MEDIA GROUP, INC.**

cc: All Counsel of Record *via ECF*

¹ By filing this letter Motion, Defendants do not purport to agree with Plaintiff's characterization of any information as "confidential" or as otherwise requiring redaction. Defendants' Motion should not be construed as a waiver of any arguments Defendants may have with respect to the confidentiality or sensitive nature of any information placed under seal in the Complaint. Defendants expressly reserve the right to make such arguments.